

Blumberg & Wolk, LLC

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Attorneys for Defendants, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., Richard Strauss, M.D.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

This document relates to:
All New Jersey Cases

Docket No. 1:13-md-2419-RWZ
MDL No. 02419

NOTICE TO TAKE THE VIDEO DEPOSITION

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure, the "Premier Defendants" will take the deposition of Glen Chin on Friday, May 22, 2015, beginning at 10:00 a.m. at the offices of Robert Gaynor, Esq., of Sloan and Walsh, LLP, Three Center Plaza, Boston, MA 02108. The deposition will be recorded by stenographical means and by video. See the Deposition Protocol attached.

Dated: April 1, 2015

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic and Sports
Medicine Associates of Southern New Jersey,
LLC, trading as Premier Orthopaedic Associates,
Premier Orthopaedic Associates Surgical Center,
LLC, and Kimberley Yvette Smith, M.D.,
a/k/a Kimberley Yvette Smith-Martin, M.D.

/s/Jay J. Blumberg, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certified that on April 1, 2015, a true and exact copy of the foregoing was filed with this the Clerk of the Court using the ECF system that sent a notification of this filing to all ECF registered counsel of record via email generated by the Court's ECF system.

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic and Sports
Medicine Associates of Southern New Jersey,
LLC, trading as Premier Orthopaedic Associates,
Premier Orthopaedic Associates Surgical Center,
LLC, and Kimberley Yvette Smith, M.D.,
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/s/Jay J. Blumberg

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